

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

TONYA CAMPBELL and JOHN PADEN,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

INTERCONTINENTAL CAPITAL
GROUP, INC.,

Defendant.

JOINT MOTION TO STAY PROCEEDINGS PENDING FORMAL MEDIATION

COMES NOW Defendant Intercontinental Capital Group, Inc., by counsel, and hereby submits this Joint Motion to Stay Proceedings pending Formal Mediation. In support thereof, Defendant represents as follows:

1. Plaintiff's Complaint was filed on January 21, 2022, and Plaintiff granted Defendant an extension until February 28, 2022 to Respond to the Complaint.
2. Defendant filed an Unopposed Motion for Extension of Time on February 25, 2022 and the Court granted the Motion for Extension of Time on February 28, 2022 for Defendant to Respond to the Complaint by March 14, 2022.
3. On March 11, 2022, Defendant filed another Unopposed Motion for Extension of Time to extend Defendant's time to respond to the Complaint to March 28, 2022, which this Court granted.
4. Counsel for both Parties have engaged in extensive discussions regarding potential early resolution and have set parameters for a formal, private mediation, which they are

aiming to schedule for late April 2022. The Parties are currently exchanging agreed upon damages discovery and identifying a private mediator. Accordingly, Defendant now respectfully requests that this Court stay this matter pending mediation of this dispute.

5. Provided this matter is stayed, the Parties intend to provide this Court with a status update on mediation by April 29, 2022, unless this Court requests the same sooner. In addition, if the Parties are unable to reach early resolution, they are prepared to continue with litigation.

6. Plaintiff has consented to an Order granting this Motion, which is submitted contemporaneously with this Motion.

WHEREFORE, for the foregoing reasons, Defendant Intercontinental Capital Group, Inc. requests this Court grant this Joint Motion to Stay Proceedings and grant all such relief as it deems just and proper.

Respectfully submitted,

/s/ Anders T. Sleight

Anders T. Sleight, Esq. (VSB No. 84458)
Offit Kurman, P.A.
8000 Towers Crescent Drive, Suite 1400
Vienna, VA 22182
Phone: (703) 745-1800
Fax: (703) 745-1835
anders.sleight@offitkurman.com

**Counsel for Defendant Intercontinental
Capital Group, Inc.**

Dated: March 28, 2022

/s/

Timothy L. Coffield (VSB No. 83430)
Coffield PLC
106F Melbourne Park Circle
Charlottesville, VA 22901
Phone: (434) 218-3133
Fax: (434) 321-1636
tc@coffieldlaw.com

**Counsel for Plaintiffs Tonya Campbell and
John Paden and all others similarly situated**

Dated: March 28, 2022

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing (NEF) to all registered users of the Court's CM/ECF system who have filed notices of appearance in this matter..

/s/ Anders T. Sleight

Anders T. Sleight, Esq.